

FILED

FEB 20 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

1 BARRY J. PORTMAN
Federal Public Defender
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4
5 Counsel for Defendant HASSAN
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.
13

14 CARL HASSAN,

15 Defendant.
16

)
) No. CR 06-00503 DLJ
)

) STIPULATION AND [PROPOSED]
) ORDER FOR CONTINUANCE OF
) CHANGE OF PLEA DATE AND
) EXCLUSION OF TIME UNDER THE
) SPEEDY TRIAL ACT, 18 U.S.C. §
) 3161 ET SEQ.
)

17 IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of
18 plea date in this case, previously scheduled for Wednesday, January 24, 2007, at 11:30 a.m.,
19 before Honorable Judge D. Lowell Jensen, may be continued to Wednesday, February 21, 2007, at
20 10:30 a.m. for change of plea or trial setting. A continuance to February 21, 2007, will allow time
21 for defense counsel to meet with her client who has been in and out of the hospital over the few
22 week. In addition, the time will allow time for the defense to continue with its investigation. The
23 parties therefore stipulate that the time from January 24, 2007, to February 21, 2007, should be
24 excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(8)(A)
25 and (B)(iv) for adequate preparation of counsel in order to allow defense counsel to meet with the
26

STIP. CONTINUING
CHANGE OF PLEA DATE

1 defendant and continue with its investigation.

2 DATED: February 2, 2007

3 JOYCE LEAVITT /S/
4 Assistant Federal Public Defender

5 DATED: February 2, 2007

6 STEPHEN CORRIGAN /S/
Assistant United States Attorney

7 **SIGNATURE ATTESTATION**

8 I hereby attest that I have on file all holograph signatures indicated by a "conformed"
signature ("/S/") within this efiled document.


9 **ORDER**

10
11 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea date in
12 this case, currently scheduled for Wednesday, January 24, 2007, at 11:30 a.m., shall be continued
13 to Wednesday, February 21, 2007, at 10:30 a.m. for change of plea or trial setting.

14 IT IS FURTHER ORDERED that the time from January 24, 2007, through February 21,
15 2007, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
16 3161(h)(8)(A) and (B)(iv) for adequate preparation of counsel. The Court finds that the ends of
17 justice served by the granting of the continuance outweigh the best interests of the public and the
18 defendant in a speedy and public trial and the failure to grant the requested continuance would
19 unreasonably deny counsel time necessary for effective preparation, taking into account due
20 diligence.

21
22 SO ORDERED.

23 DATED: 2-20-07

24 
25 HONORABLE D. LOWELL JENSEN
United States District Judge

26
STIP. CONTINUING
CHANGE OF PLEA DATE